

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

July 10, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Kiyo A. Matsumoto, U.S.D.J.
225 Cadman Plaza East
Courtroom 6B South
Brooklyn, NY 11201-1804

Re: Victoria NYC I Inc d/b/a Rx2Go v. DGN Pharmacy Inc d/b/a PersonalRx
Case No.: 1:25-cv-975 (KAM) (MMH)

Dear Judge Matsumoto:

This firm represents the Plaintiff in the above-captioned case. I write in connection with Plaintiff's motion for a default judgment. During the filing process, it came to your undersigned's attention that Plaintiff's declaration in support contains financial information which is subject to confidentiality requirements as Plaintiff respectfully submits they constitute trade secrets. As a result, Plaintiff intends to file a motion to seal its declaration in support of the motion for a default judgment and accompanying exhibits. Plaintiff respectfully requests that the deadline to file such a motion to seal be set for no later than July 31, 2025 and, upon deciding same, Plaintiff shall file its declaration in support of the motion for a default judgment.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
July 10, 2025

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Attorneys for Plaintiff
DGN Pharmacy Inc d/b/a PersonalRx